



Michigan Fly Fishing Club
PO Box 530861
Livonia, MI 48153

Director Dan Eichinger
Department of Natural Resources
P.O. Box 30028
Lansing, MI 48909
dnr-director@michigan.gov

October 7, 2022

Re: Proposed National Guard Expansion

Dear Director Eichinger,

On September 14, 2022, the Michigan Fly Fishing Club Board of Directors passed a motion opposing the Camp Grayling expansion.

Michigan Fly Fishing Club's purpose is to be "an organization of fly fishers dedicated to the promotion of fly fishing, the preservation of the arts of fly tying, rod building, and the protection of gamefish and their habitat." The expansion of Camp Grayling endangers just that - gamefish and their habitat.

We are a group comprised of around 360 fly fishing anglers spread throughout the State of Michigan. With all that fishing, in the land of 1000 lakes, there is a reason the Au Sable River is called the Holy Waters. It houses spring fed fisheries with natural breeding, along with the habitat that supports it. Damage to headwaters begets damage to the river.

Henry Ford and Thomas Edison used to visit the same hallowed waters, staying at the historical Fuller's lodge, to entertain businessmen on the Au Sable River because it is such a precious resource.

This precious resource encompasses necessary wetlands that filter water, endangered turtles and other species, endangered indigenous plant life, breeding grounds for fish and animals alike, ground waters, all of which are an integral part of the ecosystem in the proposed expansion area.

Members of the Michigan Fly Fishing Club have come to the Board of Directors to express their concerns about the proposed expansion, many of which are military veterans. Their concerns include:

- The 1,500 foot easement from the rivers is still well within the area where anything absorbed by the ground will definitely end up in the river itself, therefore in the river's wildlife as well.
- This expansion would harm the watersheds of multiple rivers: the AuSable River, Manistee River and Muskegon River.

- River, water and wetland access for hunting and fishing will be damaged by the expansion.
- There have been no studies, at least not made public, as to the effects on the wildlife and water within the expansion area based on the new proposed warfare training exercises.
- Closures for military expanded usage will harm tourism in an area that bases its economy on that very tourism.
- Residents in Lovells and surrounding areas will essentially be civilians living on a military base.
- Camp Grayling has not shown why proposed additional training activities cannot be conducted within the current Camp Grayling boundaries or at an underutilized base.
- Terms of the proposed agreement do not prove sufficient to determine how the land will be used and what effects will be incurred upon the surrounding environment.
- There is no accountability for the advertised subleasing to private business's use of the land.
- Military water vehicle traffic and training activities damage surrounding banks and riverbeds, causing erosion, restructuring of the water system and substrate, thus changing the entire ecological system's access to needed food.
- The 20 year lease sets a precedent going forward, to further harm this delicate, citizen hallowed ecological area.
- There are no studies nor information on the environmental impact of the expansion land's usage.
- Camp Grayling has not proven they can be good stewards of the land and water they currently utilize.
- The proposed, no money lease is using public land for private gain.
- There has been failure of Camp Grayling leadership to quantify a need for the expansion.
- Drones have been documented hovering over individual private residences.
- There is a concern military grade vehicles are damaging additional major roadways leaving taxpayers to pay the repairs.
- Members expressed the opinion "low impact" usage implies a lack of troops in one's back yard, yet Club members who live in Grayling, and the surrounding areas, have seen just that.

The proposed agreement violates the Department of Natural Resources Mission Statement. The proposed expansion into this delicate ecosystem is **not** a commitment to conservation, protection, management, use and enjoyment of the state's natural and cultural resources for current and future generations. It is **not** striving to protect natural and cultural resources, to ensure sustainable recreation use and enjoyment, enable strong natural resource based economies, improve and build strong relationships and partnerships, and foster effective business practices and good governance - as your mission states. The proposed lease is not within the Department of Natural Resource's jurisdiction.

The proposed agreement also violates the Natural Resources and Environmental Protection Act. The proposed expansion does **not** protect the environment and natural resources of the state; ...does **not** regulate the discharge of certain, in this case unspecified and unknown, substances into the environment; **nor does it** regulate the use of certain lands, waters, and other natural resources of the state; *to protect people's right to hunt and fish in this area.*

There is a need to balance the need for training and technology advances in warfare, with the private enjoyment of land by citizens of the public. The land in question is owned by the State of Michigan and is meant to be utilized for citizens' use and enjoyment.

The proposed expansion is like taking a State Park and closing it for military training exercises. Please protect this land, and our right as citizens to access it for residential life and recreational enjoyment.

Very truly yours,

Sybil Hunter
President
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<https://mffc.org>

cc: Gov. Gretchen Whitmer
U.S. Sen. Debbie Stabenow
U.S. Sen. Gary Peters
MI Rep. Haley Stevens
MI Sen. Dayna Polehank
MI Sen. Rosemary Bayer
MI Rep. Matt Koleszar
Tom Barnes